

ORIGINAL

MELVIN JONES JR. - Plaintiffs /
PRO SE

Colleen Connors
829 Campbell St.
Flint, MI 48507

FILED
JUL 23 2018

U.S. DISTRICT COURT
FLINT, MICHIGAN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Melvin Jones, Jr, et al.,

Plaintiff(s),

v.

Case No. 3:18-cv-11934-RHC-APP
Hon. Robert H. Cleland

Michigan Department of Civil
Rights, et al.,

Defendant(s),

SUPPLEMENTED

Plaintiff's* Request
FOR JUDICIAL
NOTICE PER FRCP
Rule 201 :

* Melvin JONES JR's
Supplemented REQUEST

PAGE 1 of 4

Plaintiffs' REQUEST FOR JUDICIAL NOTICE:

The facts which Plaintiff
Melvin Jones JR. Requests that
the Honorable Court take
Judicial Notice of are generally
known within the District Court's
territorial jurisdiction;

and

Said facts can be accurately and
readily determined from sources
whose accuracy cannot reasonably
be questioned.

Plaintiff's REQUEST FOR JUDICIAL NOTICE (cont'd):

Plaintiff, Melvin Jones Jr, also respectfully contends that the District Court is hereby supplied with the necessary information for Judicial Notice to be taken... which is to say,

Plaintiff Jones intends for the instant Request for Judicial Notice to be a supplement to his pending other Rule 201 Requests;

FACTS TO BE JUDICIALLY NOTICE:

Doc # 6, 8,
and Doc # 9,
Doc # 14.

JD-18 Asthma letter dated August 27th, 2010 regarding Melvin Jones. [Allergy And Asthma Associates]; And envelop as to said 8-27-2010 letter.

PAGE 3 OF 4

Plaintiffs Request for Judicial Notice (cont'd):

JD-18a Plaintiffs' May 30th, 2016 Reasonable Accommodation Request.

JD-19 Plaintiffs' 11-30-2016 Reasonable Accommodation Request (with attachment ^{PDF})

JD-20 Attachment of ^{PDF} Plaintiffs' 11-30-2016 Reasonable Accommodation Request.

JD-21 ^{NOVEMBER 30th, 2016} Defendants' John Calvin, Candace Crawford Parc Lafarete RESPONSE to Plaintiffs' Reasonable Accommodation Requests.

JD-22 Plaintiff Melvin Jones JR.'s June 22nd, 2010 Asthma Specialists Letter with DIAGNOSIS OF SEVERE-PERSISTANT Asthma.


JD 22a letter dated October 18th, 2010 Regarding Plaintiff Melvin Jones JR.'s medical CONDITION OF SEVERE RESPIRATORY CHRONIC CONDITION.

JD 23 Plaintiff Melvin Jones JR.'s 6-22-2012 Diagnosis of Dizziness, and Asthma.

JD 24 Plaintiff Melvin Jones JR.'s March 9th 2012 DIAGNOSIS OF SEVERE PERSISTANT Asthma.

DATE: July 21st 2018

email: meljonesjr@gmail.com


MELVIN JONES JR - Plaintiff
PRO SE
810-962-6225
829 Campbell ST - FLINT
MI. 48507



ALLERGY AND ASTHMA ASSOCIATES

OF NORTHERN CALIFORNIA

A MEDICAL CORPORATION

ARTHUR A. BIEDERMANN, M.D.
JAMES D. WOLFE, M.D.
ALAN B. GOLDSOBER, M.D.
ROBERT T. TORRANO, M.D.
TOBY LEVENSON, M.D.
JEFFREY L. KISHYAMA, M.D.
ROXANNE S. LEUNG, M.D.
KRISTI M. ANNECONE, F.N.P.
CARRIE A. KAUFMANN, P.N.P.-BC

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9360 NO NAME UNO, SUITE 140 • GILROY, CA 95020-3535
3329 MISSION DRIVE • SANTA CRUZ, CA 95065-1827
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TELEPHONE (831) 479-6933
TELEPHONE (510) 797-5555
TELEPHONE (650) 210-9292

8/27/10

RE: Melvin Jones

Dear Sir / Madame:

Mr. Jones is a member of our medical practice. With asthma under our care. He requires a regular, daytime schedule to optimize his health. Please consider changing his schedule. Do not hesitate to call me with any questions.

Sincerely,

Dr. Leung

JD-18



ALLERGY AND ASTHMA ASSOCIATES
OF NORTHERN CALIFORNIA
A MEDICAL CORPORATION
4050 MOORPARK AVENUE
SAN JOSE, CALIFORNIA 95117

8-30-10

Melvin Jones



Colleen Connors <cmcolleen4@gmail.com>

urgent - please read me... vip question regarding Parc Lafayette Policy

Colleen Connors <cmcolleen4@gmail.com>

Mon, May 30, 2016 at 11:36 AM

To: candace@mgkrealty.com

Cc: Danielle Sanders <danielle@mgkrealty.com>, ayana@mgkrealty.com, Mel jones jr <meljonesjr@gmail.com>, Colleen Connors <CMColleen4@gmail.com>

DATE: May 30, 2016

Candace,

Would you please clarify the current policy on barbecuing at Parc Lafayette?

Also, if the Board is planning to designate a communal barbecue area, once such an area is designated, please keep in mind that the smoke from grilling/barbecuing can irritate asthma, from which Mel and I both suffer.

While my (e.g. Colleen's) asthma is mild, Mel's asthma is noted in his medical chart as severe persistent (asthma).

Also, more important -- if there has been/ or will be an authorization for barbecuing to be done on co-owner patio and/ or rear yard patio -- please be especially mindful of said asthma conditions **AND that the smoke from said barbecuing can pose a possible carbon monoxide issue as such blows into the upstairs units here at Parc Lafayette.**

In addition, Mel is willing to provide you with documentation as to his asthma (e.g. from his primary doctor's office).

Please respond asap.

Thank you,

Colleen #1927

Shortly after the instant email was sent to Association Management, during an in-person conversation between Candace Crawford and

I (Melvin Jones Jr.), Candace told me that "look Mel, we have already agreed to make things right with you and Colleen for the cost of damage regarding Roof leak MOLD into your unit, but if you two continue to complain the AGREEMENT will be canceled by us."

JD - 18a

Melvin Jones Jr.
Plaintiff Pro SE



Mel jones jr <meljonesjr@gmail.com>

'accessible route' --- Fair Housing ADA request as to transition of the 'ramp' such that said transition meets the sidewalk/ is LEVEL with the side walk

Colleen Connors <cmcolleen4@gmail.com>

Wed, Nov 30, 2016 at 10:00 AM

To: jcalvin@maglawpllc.com, candace@mgkrealty.com, Danielle Sanders <danielle@mgkrealty.com>, ayana@mgkrealty.com

Cc: Mel jones jr <meljonesjr@gmail.com>, Colleen Connors <CMColleen4@gmail.com>

<<< SEE ATTACHED FAIR HOUSING ADA REQUEST >>>



Gmail - 'accessible route' --- Fair Housing ADA request as to transition of the 'ramp' such that said transition meets the sidewalk_ is LEVEL with the side walk.pdf

63K

JD-19



Mel jones jr <meljonesjr@gmail.com>

'accessible route' --- Fair Housing ADA request as to transition of the 'ramp' such that said transition meets the sidewalk/ is LEVEL with the side walk

1 message

Mel jones jr <meljonesjr@gmail.com>
To: mel jones jr <meljonesjr@gmail.com>

Wed, Nov 30, 2016 at 9:57 AM

30th, November 2016


Mel's FHEO ADA REQUEST --- Fair Housing ADA request as to transition of the 'ramp' such that said transition meets the sidewalk/ is LEVEL with the side walk.

p.s. Mr. Calvin --- can you please email Colleen Connors, and the Fair Housing Regional Office in Chicago as well as myself [Melvin Jones Jr.] as to Parc Lafayette's response to my FHEO ADA Request which I have requested via this email.

Sincerely,

Mel Jones Jr. -- owner #1927

JD - 20


Melvin Jones Jr.
Plaintiff Pro SE

(Attachment of
Colleen's NOVEMBER 30th
2016 Reasonable
accommodation Request
email.)



Mel jones jr <meljonesjr@gmail.com>

'accessible route' --- Fair Housing ADA request as to transition of the 'ramp' such that said transition meets the sidewalk/ is LEVEL with the side walk

John Calvin <jcalvin@maglawpllc.com>

Wed, Nov 30, 2016 at 10:05 AM

To: Colleen Connors <cmcolleen4@gmail.com>, "candace@mgkrealty.com" <candace@mgkrealty.com>,
Danielle Sanders <danielle@mgkrealty.com>

Cc: Mel jones jr <meljonesjr@gmail.com>

Ms. Connors, you can stop your emails. I just received confirmation from Ms. Trujillo that HUD has accepted the matter for investigation and letters are being sent out to that effect. Hopefully the investigator who is assigned to the matter will be able to help put things in perspective for you.

John F. Calvin

MAKOWER ABBATE GUERRA WEGNER VOLLMER PLLC

30140 Orchard Lake Road

Farmington Hills, MI 48334

Phone: 248.254.7600

Direct: 248.254.7599

Fax: 248.671.0100

www.maglawpllc.com

From: Colleen Connors [mailto:cmcolleen4@gmail.com]

Sent: Wednesday, November 30, 2016 10:01 AM


To: John Calvin <jcalvin@maglawpllc.com>; candace@mgkrealty.com; Danielle Sanders <danielle@mgkrealty.com>; ayana@mgkrealty.com

Cc: Mel jones jr <meljonesjr@gmail.com>; Colleen Connors <CMColleen4@gmail.com>

Subject: Fwd: 'accessible route' --- Fair Housing ADA request as to transition of the 'ramp' such that said transition meets the sidewalk/ is LEVEL with the side walk

<<< SEE ATTACHED FAIR HOUSING ADA REQUEST >>>

JD-21


Melvin Jones Jr.
PLAINTIFF PRO SE

Defendants' Parc
Laferette, John
Calvin, and Candace
Crawford's interference,
WRONGFUL DENIAL OF
Jones / Connors'
Reasonable Accommodation
requests) + Retaliation

+ said Defendants' conduct was meant to induce
PLAINTIFFS to move out of Parc Laferette condos.



ALLERGY AND ASTHMA ASSOCIATES

OF NORTHERN CALIFORNIA

A MEDICAL CORPORATION

June 22, 2010

ARTHUR A. BIEDERMANN, M.D.
JAMES D. WOLFE, M.D.
ALAN B. GOLDSOBER, M.D.
ROBERT T. TORRANO, M.D.
TOBY LEVENSON, M.D.
JEFFREY L. KISHIYAMA, M.D.
ROXANNE S. LEUNG, M.D.
KRISTI M. ANNECONE, F.N.P.
CARRIE A. KAUFMANN, P.N.P.-B.C.

MINORU YAMATE, M.D.
FOUNDER

RE: Melvin JONES, JR
DOB: 08-11-64

To Whom It May Concern:

I am writing in support of my patient, Melvin Jones, Jr. I have been his Asthma Specialist Physician since March 22 of 2010. I can attest that he suffers from severe persistent asthma and requires daily medical treatment and regular follow-up in my clinic.

Please allow him to have reasonable periodic breaks or time off, as needed, to administer asthma medication. I would also specially request that he not handle any cleaning products nor be required to transport patients, as this may trigger his asthma symptoms.

Please do not hesitate to contact me with any questions or concerns. I can be reached at (408) 243-2700.

Warmest regards,

Roxanne S. Leung, M.D.

RSLjk

MOORPARK OFFICE: 4050 MOORPARK AVENUE, SAN JOSE, CALIFORNIA 95117-1840
BLOSSOM HILL OFFICE: 393 BLOSSOM HILL ROAD, SUITE 315, SAN JOSE, CALIFORNIA 95123-1654
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RESEARCH CENTER: 4050 MOORPARK AVENUE, SUITE 6, SAN JOSE, CALIFORNIA 95117-1840

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TELEPHONE (650) 210-9292 FAX (650) 968-1632
TELEPHONE (408) 553-0709 FAX (408) 553-0757

FORM 152 LH

→ JD - 22



ALLERGY AND ASTHMA ASSOCIATES
OF NORTHERN CALIFORNIA
A MEDICAL CORPORATION

October 18, 2010

RE: Melvin JONES JR.
DOB: 08-11-64

ARTHUR A. BIEDERMANN, M.D.
JAMES D. WOLFE, M.D.
ALAN B. GOLDSOBER, M.D.
ROBERT T. TORRANO, M.D.
TOBY LEVENSON, M.D.
JEFFREY L. KISHIYAMA, M.D.
ROXANNE S. LEUNG, M.D.
KRISTI M. ANNECONE, F.N.P.
CARRIE A. KAUFMANN, R.N.P.-B.C.

MINORU YAMATE, M.D.
FOUNDER

To whom this may concern,

Mr. Melvin Jones Jr. is under my medical care. He is being treated for a severe respiratory chronic condition which requires daily medical treatment and regular follow-up. In order to optimize his health and continued treatment, I respectfully request that he have a regular, daytime schedule which finishes by 5 pm.

I am more than happy to personally discuss this case with the medical director of your corporation. Please do not hesitate to contact me at 408-243-2700.

Warmest regards,


Roxanne S. Leung, M.D.

MOORPARK OFFICE: 4050 MOORPARK AVENUE, SAN JOSE, CALIFORNIA 95117-1840
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TELEPHONE (510) 797-5555 FAX (510) 797-5596
TELEPHONE (650) 210-9292 FAX (650) 968-1632
TELEPHONE (408) 553-0709 FAX (408) 553-0757

FORM 152 LH

JD-22a

MAGGIE S. CHAU, D.O.
 200 JOSE FIGUERES AVENUE, SUITE 205
 SAN JOSE, CA 95116 (408) 923-8098 FX223-8198
 54 N. BASCOM AVENUE
 SAN JOSE, CA 95128 (408) 294-7173 FX223-1596

DEA # BC 3800615 LCP # 20A6243

NAME Jones, Melvin AGE 51
 ADDRESS 21/12 DATE 6/21/12

TAMPER-RESISTANT FEATURES INCLUDE: SAFETY-BLUE
 GRADE-RESISTANT BACKGROUND, "LEGAL" PANTOGRAPH
 AND REFILL INDICATOR

R This is to verify
 above pt was seen
 today.
 Dr. Dizzner's Asthma
 Pt. status has been
 ok & unable to
 work from 6/20/12 to
 6/25/12. Will return
 on 6/26/12. Planned

Refill NR 1 2 3 4 5

DO NOT SUBSTITUTE ☐


To ensure brand name dispensing, check and initial box.

1HIM0052730

ON 6-22-2012 I (MELVIN JONES JR.) WAS DIAGNOSED
 WITH DIZZINESS, WHICH I BELIEVE WAS A
 WORSENING OF MY CHF [CONGESTIVE HEART FAILURE].

Melvin Jones Jr.
 Plaintiff Pro SE

JD-23



ALLERGY AND ASTHMA ASSOCIATES

OF NORTHERN CALIFORNIA

Medical Corporation

4018 MOORPARK AVENUE
379 BLOSSOM HILL ROAD, SUITE 315
209 JOSE ROGUES AVENUE, SUITE 410
9340 NO. NAYE DR., SUITE 140
3399 MISSION DRIVE
2287 MOUNTAIN AVENUE, SUITE E
285 SOUTH DRIVE, SUITE 1

SAN JOSE, CA 95117-1840
SAN JOSE, CA 95121-1634
SAN JOSE, CA 95116-1979
GILROY, CA 95020-3535
SANTA CRUZ, CA 95065-1027
FREMONT, CA 94628-1422
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TELEPHONE (408) 254-0300
TELEPHONE (408) 245-1800
TELEPHONE (408) 277-4975
TELEPHONE (408) 277-5555
TELEPHONE (408) 210-9292

NAME Hevin Dano AGE 3/9/12 DATE 3/9/12
ADDRESS _____

R Dr. Angel Makrova
2500 Inspired Dr. Bldg 14
Mountain View, CA 94040
(650) 701-7362

Dr. Sam Purgina
M.D.

PLEASE LABEL CONTENTS

REFILL 0 1 2 3 4 5 1 YR

ARTHUR A. BRESNAHAN, M.D.	A-119926	149877822	M.D.
JAMES D. MOORE, M.D.	G-25146	1194733428	
ALAN B. GOLDOBERG, M.D.	G-39891	1063528321	
ROBERT T. TORRANO, M.D.	G-57939	1306684709	
TOM LEBENSON, M.D.	G-74286	1049288945	
JEFFREY K. KASMAN, M.D.	G-71621	1225044527	
ROXANNE S. LEUNG, M.D.	A-103376	1730238334	
KRISTI M. ANNACONE, F.N.P.	499104	1314028591	
CARLEA A. FOURMAN, F.N.P.-BC	NP77187	1164579321	

Rev. 07/08

JD-24

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and ~~am~~ a party to this ~~adversary proceeding~~ adversary proceeding. My ~~address is~~ address is: I, Colleen Connors AM a party to the Civil Law Suit; and my mailing address is 829 Campbell St Flint, MI 48507 TO REDUCE BURDEN AND COST... THE SAID DOCUMENT HAS BEEN SERVED VIA EMAIL.

A true and correct copy of the foregoing document entitled (specify) Plaintiff Jones' PLAINTIFF'S ~~REQUEST FOR JUDICIAL NOTICE~~ Plaintiffs' REQUEST FOR JUDICIAL NOTICE IN FEDERAL CIVIL CASE # 3:18

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below: PER FRCP Rule 201

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 7-15-2018 I checked the CM/ECF docket for this ~~adversary proceeding~~ adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Attorney for Defendants: John Calvin → Theresa Asoklis
John Finkelman → Law Firm of Collins, Emman
Steve Guerra → 4000 Town Ctr. Southfield, MI

2. SERVED BY UNITED STATES MAIL

On (date) 7-15-2018, I served the following persons and/or entities at the last known addresses: 7-15-2018 by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEFENDANTS:

MICHIGAN Department of Civil Rights
Reynard Morey-Greer
PARC Lafayette Association

JOHN FINKELMANN
Steve Guerra
Candace Crawford
DANIEL LEE

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 7-15-2018, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

DEFENDANTS [AND/OR] THEIR ATTORNEYS WERE SERVED VIA EMAIL

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

COLLEEN CONNORS

Printed Name

Signature

Date